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FILED

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Clerk, U.S. District Court
District Of Montana
Great Falls

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THERESA ANNE CHABOT,

Defendant.

CR 22- 18 -M- DLC

INDICTMENT

UNLICENSED MONEY
TRANSMITTING BUSINESSES (Count I)
Title 18 U.S.C. § 1960
(Penalty: Five years of imprisonment,
\$250,000, and three years of supervised
release)

CONSPIRACY TO COMMIT MONEY
LAUNDERING (Count II)
Title 18 U.S.C. § 1956(h)
(Penalty: 20 years of imprisonment,
\$500,000 fine, and three years of supervised
release)

MONEY LAUNDERING – PROMOTION
(Counts III-XIX)
Title 18 U.S.C. § 1956(a)(1)(A)
(Penalty: 20 years of imprisonment,
\$500,000 fine, and three years of supervised
release)

	MONEY LAUNDERING – SPENDING (Counts XX-XXX) Title 18 U.S.C. § 1957 (Penalty: Ten years of imprisonment, \$250,000, and three years of supervised release) FORFEITURE Title 18 U.S.C. § 982(a)(1) Title 21 U.S.C. § 853(p)
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THE GRAND JURY CHARGES:

At all times relevant to the indictment:

1. The defendant, THERESA ANNE CHABOT, individually, and through her business, Avalanche Creek, LLC, was, and operated as, the following:

- An unlicensed money transmitting business, as outlined in 18 U.S.C. § 1960(b)(1). An unlicensed money transmitting business affects interstate and foreign commerce in any manner and degree and fails to comply with money transmitting business registration requirements under 31 U.S.C. § 5330, and the regulations prescribed under such section, including 31 C.F.R. §§ 1022.100-1022.670.
- A money transmitter, as outlined in 18 U.S.C. § 1960(b)(2). Money transmitting includes transferring funds on behalf of the public by any and all means, including, but not limited to, transfers within the United States and to locations abroad by wire, check, draft, facsimile, and courier.

2. A money mule is a person who transfers illegally acquired money on behalf of, and at the direction of, other individuals. Money mules often receive a commission for providing their services.

3. THERESA ANNE CHABOT, individually, and through her business, Avalanche Creek, LLC, operated as a money mule related to various wire fraud schemes occurring within the United States. These wire fraud schemes included, among others, advance pay schemes, internet-enabled frauds, investment schemes, romance schemes, lottery and sweepstakes frauds, and COVID-19 funding fraud.

4. THERESA ANNE CHABOT opened and maintained bank accounts within the United States, collected the proceeds from wire fraud schemes committed within the United States, and then transmitted the money overseas. During the scheme, the defendant, THERESA ANNE CHABOT, opened over 50 bank accounts. Banks closed numerous accounts after reviewing the activity, and at least 15 banks directly informed CHABOT the accounts were being closed due to fraud, violation of bank policies, and other identified misuse. Despite the repeated closure of bank accounts, CHABOT would open new bank accounts that enabled her to receive proceeds from the above-identified fraud schemes with victims located in the United States. THERESA ANNE CHABOT received a fee, which in many instances totaled approximately ten percent of the fraudulent

proceeds deposited into her bank accounts. She would then forward the remaining funds overseas, including to Dubai, which is in the United Arab Emirates.

COUNT I
UNLICENSED MONEY TRANSMITTING BUSINESS

Beginning in or about May 2017, and continuing thereafter until in or about February 2021, at Kalispell and Flathead County, in the State and District of Montana, and elsewhere, the defendant, THERESA ANNE CHABOT, knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business, having failed to comply with the money transmitting business registration requirements under 31 U.S.C. § 5330, and regulations prescribed under such section, all in violation of 18 U.S.C. § 1960.

COUNT II
CONSPIRACY TO COMMIT MONEY LAUNDERING

Beginning on or about May 2016, and continuing thereafter until on or about February 2021, at Kalispell and Flathead County, in the State and District of Montana, and elsewhere, the defendant, THERESA ANNE CHABOT, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree to conduct financial transactions that involved the proceeds of specified unlawful activity, that is, Wire Fraud, in violation of 18 U.S.C. § 1343:

- (1) with the intent to promote the carrying on of such specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A), and;
- (2) with the intent to engage in monetary transactions in criminally derived property of value greater than \$10,000 and derived from the specified unlawful activity, in violation of 18 U.S.C. § 1957(a),

That is, THERESA ANNE CHABOT operated as a money mule to receive fraudulent proceeds from numerous wire fraud schemes committed within the United States, and then funneled the money to herself and others, both overseas and within the United States, in an attempt to disguise such financial transactions for the benefit of the co-conspirators, all in violation of 18 U.S.C. § 1956(h).

COUNTS III-XIX
MONEY LAUNDERING – PROMOTION

Beginning in or about May 2016, and continuing thereafter until in or about February 2021, at Kalispell and Flathead County, in the State and District of Montana, and other places, the defendant, THERESA ANNE CHABOT, knowing that the property involved in a financial transaction represented proceeds of some form of unlawful activity, conducted, and attempted to conduct, such a financial transaction that in fact involved the proceeds of specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, that is wire fraud, which is identified in the table below, all in violation of 18 U.S.C. § 1956(a)(1)(A).

Count	Amount	Date	Account
III	\$11,120.00	6/30/2017	Umpqua 0077
IV	\$3,143.00	2/15/2018	HSBC 0008
V	\$26,587.00	2/16/2018	HSBC 0008
VI	\$9,973.00	2/16/2018	HSBC 0008
VII	\$9,986.00	2/20/2018	HSBC 0008
VIII	\$15,494.00	8/7/2018	KeyBank 1940
IX	\$4,487.00	8/20/2018	KeyBank 1940
X	\$25,000.00	10/10/2018	CitiBank 1636
XI	\$9,646.00	12/6/2018	Farmers State Bank 1248
XII	\$10,000.00	12/6/2018	Farmers State Bank 0227
XIII	\$30,052.00	12/12/2018	Farmers State Bank 1428
XIV	\$49,500.00	3/1/2019	Farmers State Bank 1248
XV	\$10,638.00	3/18/2019	Farmers State Bank 1248
XVI	\$34,264.00	2/14/2020	Rocky Mountain Bank 5242
XVII	\$4,500.00	6/22/2020	BBVA 7536
XVIII	\$30,000.00	7/21/2020	NBKC Bank 8936
XIX	\$188,000.00	2/16/2021	NBKC Bank 8936

COUNTS XX-XXX
MONEY LAUNDERING – SPENDING STATUTE

Beginning in or about May 2016, and continuing thereafter until in or about February 2021, at Kalispell and Flathead County, in the State and District of Montana, and elsewhere, the defendant, THERESA ANNE CHABOT, knowingly engaged, and attempted to engage, in a monetary transaction in the United States, in criminally derived property of a value greater than \$10,000, as described in the table below, which was derived from specified unlawful activity, that is wire fraud, all in violation of 18 U.S.C. § 1957.

Count	Amount	Date	Account
XX	\$11,120.00	6/30/2017	Umpqua 0077
XXI	\$26,587.00	2/16/2018	HSBC 0008
XXII	\$15,494.00	8/7/2018	KeyBank 1940
XXIII	\$25,000.00	10/10/2018	CitiBank 1636
XXIV	\$30,052.00	12/12/2018	Farmers State Bank 1428
XXV	\$49,500.00	3/1/2019	Farmers State Bank 1248
XXVI	\$10,638.00	3/18/2019	Farmers State Bank 1248
XXVII	\$34,264.00	2/14/2020	Rocky Mountain Bank 5242
XXVIII	\$15,000.00	6/18/2020	BBVA 7536
XXIX	\$30,000.00	7/21/2020	NBKC Bank 8936
XXX	\$188,000.00	2/16/2021	NBKC Bank 8936

FORFEITURE

Upon conviction of the money laundering offenses set forth in counts I-XXX, the defendant, THERESA ANN CHABOT, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real and personal, which constitutes and is derived from proceeds traceable to the offense. That includes, but is not limited to, the following property:

- 2021 Chevrolet Tahoe, Vehicle Identification Number of 1GNSKNKD7MR102193

The United States of America, pursuant to 21 U.S.C. § 853(p), shall be entitled to forfeiture of substitute property if any of the property that is subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON



LEIF M. JOHNSON
United States Attorney



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney